

DOCKET NO. FST-CV21-6050152S	:	SUPERIOR COURT
	:	
CONRADO GONZALEZ, et al.	:	J.D. OF STAMFORD
	:	
v.	:	AT STAMFORD
	:	
SYNAGRO-CONNECTICUT, LLC, et al.	:	APRIL 15, 2021

MOTION TO CONSOLIDATE PROCEEDINGS

Pursuant to Connecticut Practice Book § 9-5, the defendant, Synagro-Connecticut, LLC hereby moves to consolidate this proceeding and *City of Stamford v. Synagro-Connecticut, LLC, et al.*, (the “Property Damage Case”) which is also pending in the Stamford Superior Court. In support of this motion the undersigned counsel represents as follows:

1. Both proceedings arise out of the same explosion event that occurred on August 1, 2019, at 111 Harbor View Avenue in Stamford, Connecticut.
2. The City of Stamford and Synagro-Connecticut, LLC are parties in both cases.
3. Consolidation is warranted because it will allow the proceedings of the substantially related matters to progress together and avoid duplication of written discovery, depositions, and experts. This will facilitate the orderly proceedings of both matters.
4. Consolidation is also warranted because it will prevent inconsistent rulings or results in one case or the other that could impact the legal theories in the other case.
5. The Court has already consolidated the Property Damage Case with *USAA General Indemnity A/S/O Robert Zeug v. Synagro-Connecticut, LLC*, which also stemmed from the August 1, 2019, explosion, in recognition of the overlapping issues.
6. Pursuant to Connecticut Practice Book § 9-5, a copy of this Motion to Consolidate will be filed in all of the court files proposed to be consolidated.
7. Pursuant to Connecticut Practice Book § 9-5, a copy of the Motion to Consolidate filed in

the Property Damage Case is attached hereto as Exhibit A.

8. A copy of this motion has been served on all parties to this action in accordance with Connecticut Practice Book §§ 10-12 through 10-17.

WHEREFORE, the defendant respectfully requests that the following proceedings be consolidated:

- *City of Stamford v. Synagro-Connecticut, LLC, et al.*, FST-CV-20-6046431-S, now pending in the Judicial District of Stamford at Stamford.
- *Gonzalez, et al. v. Synagro-Connecticut, LLC, et al.*, FST-CV-21-6050152-S, now pending in the Judicial District of Stamford at Stamford.

RESPECTFULLY SUBMITTED,
THE DEFENDANT,
SYNAGRO-CONNECTICUT, LLC,
BY ITS ATTORNEYS,

/s/427809

Timothy R. Scannell, Esq.
tscannell@boyleshaughnessy.com
Michael D. DeMeola, Esq.
mdemeola@bsctrilattorneys.com
Walter J. Klimczak III, Esq.
wklimczak@boyleshaughnessy.com
Boyle | Shaughnessy Law, P.C.
162 East Avenue, Suite 1C
Norwalk, CT 06851
Tel.: (860) 952-9800
Fax: (860) 278-7757

CERTIFICATION

This is to certify that a copy of the foregoing was or will immediately be mailed or delivered electronically or non-electronically on April 15, 2021 to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

Michael E. Skiber, Esq.
152 East Avenue
Norwalk, CT 06851
203-615-0090
866-418-8045

Vickie Cooper, Esq.
Stamford Corporation Counsel
Municipal Office Bldg
PO Box 10152
Stamford, CT 06904

Thomas R. Gerarde, Esq.
Eric E. Gerarde, Esq.
Howd & Ludorf, LLC
65 Weathersfield Ave
Hartford, CT 06114
860-249-1361
860-249-7665

/s/440077

Walter J. Klimczak III, Esq.

Exhibit A

DOCKET NO. FST-CV20-6046431-S	:	SUPERIOR COURT
	:	
CITY OF STAMFORD	:	J.D. OF STAMFORD
	:	
v.	:	AT STAMFORD
	:	
SYNAGRO-CONNECTICUT, LLC	:	APRIL 15, 2021

MOTION TO CONSOLIDATE PROCEEDINGS

Pursuant to Connecticut Practice Book § 9-5, the defendant/apportionment plaintiff, Synagro-Connecticut, LLC hereby moves to consolidate this proceeding and *Gonzalez, et al. v. Synagro-Connecticut, LLC, et al.*, (the “Personal Injury Case”) which is also pending in the Stamford Superior Court. In support of this motion the undersigned counsel represents as follows:

1. Both proceedings arise out of the same explosion event that occurred on August 1, 2019, at 111 Harbor View Avenue in Stamford, Connecticut.
2. The City of Stamford and Synagro-Connecticut, LLC are parties in both cases.
3. Consolidation is warranted because it will allow the proceedings of the substantially related matters to progress together and avoid duplication of written discovery, depositions, and experts. This will facilitate the orderly proceedings of both matters.
4. Consolidation is also warranted because it will prevent inconsistent rulings or results in one case or the other that could impact the legal theories in the other case.
5. The Court has already consolidated the subject case with *USAA General Indemnity A/S/O Robert Zeug v. Synagro-Connecticut, LLC*, which also stemmed from the August 1, 2019, explosion, in recognition of the overlapping issues.
6. Pursuant to Connecticut Practice Book § 9-5, a copy of this Motion to Consolidate will be filed in all of the court files proposed to be consolidated.
7. Pursuant to Connecticut Practice Book § 9-5, a copy of the Motion to Consolidate filed in

the Personal Injury Case is attached hereto as Exhibit A.

8. A copy of this motion has been served on all parties to this action in accordance with Connecticut Practice Book §§ 10-12 through 10-17.

WHEREFORE, the defendant/apportionment plaintiff respectfully requests that the following proceedings be consolidated:

- *City of Stamford v. Synagro-Connecticut, LLC, et al.*, FST-CV-20-6046431-S, now pending in the Judicial District of Stamford at Stamford.
- *Gonzalez, et al. v. Synagro-Connecticut, LLC, et al.*, FST-CV-21-6050152-S, now pending in the Judicial District of Stamford at Stamford.

RESPECTFULLY SUBMITTED,
THE DEFENDANT,
SYNAGRO-CONNECTICUT, LLC,
BY ITS ATTORNEYS,

/s/427809

Timothy R. Scannell, Esq.
tscannell@boyleshaughnessy.com
Michael D. DeMeola, Esq.
mdemeola@bsctrilattorneys.com
Walter J. Klimczak III, Esq.
wklimczak@boyleshaughnessy.com
Boyle | Shaughnessy Law, P.C.
162 East Avenue, Suite 1C
Norwalk, CT 06851
Tel.: (860) 952-9800
Fax: (860) 278-7757

CERTIFICATION

This is to certify that a copy of the foregoing has been sent this date to the following counsel and self-represented parties, upon whom service is required pursuant to Practice Book Section 10-12:

John H. Kane, Esq.
Robinson & Cole
1055 Washington Blvd.
Stamford, CT 06901
jkane@rc.com

PHV George M. Ferreti
222 N. LaSalle Street #1400
Chicago, IL 60404
gferreti@fgppr.com

Paul D. Meade, Esq.
Halloran & Sage, LLP
One Goodwin Square
225 Asylum Street
Hartford, CT 06103
meade@halloransage.com

Angeline N. Ioannou, Esq.
Lewis Brisbois Bisgaard & Smith, LLP
185 Asylum Street, Suite 2603
Hartford, CT 06103
HartfordEService@LewisBrisbois.com

Nicole R. Fernandes, Esq.
Wilson Elser Moskowitz Edelman & Dicker
1010 Washington Blvd., Suite 603
Stamford, CT 06901
Nicole.fernandes@wilsonelser.com

James F. Shields, Esq.
Law Office of James F. Shields
500 Enterprise Drive, Suite 303
Rocky Hill, CT 06067
James.shields@zurichna.com

Peter O'Keefe, Esq.
Jackson O'Keefe, LLP
433 Silas Deane Highway
Wethersfield, CT 06109
pleadings@jacksonokeefe.com

Holly J. Winger, Esq.
Brenner Saltzman & Wallman, LLP
271 Whitney Avenue
New Haven, CT 06511
hwinger@bswlaw.com

Robert G. Clemente
Cooney, Scully and Dowling
Hartford Square North
10 Columbus Boulevard
Hartford, Connecticut 06106
860-527-1141/Juris No. 10872

/s/427809

Michael D. DeMeola, Esq.